

DRBC 106 EOY 2018 Comments

- *Report was received on 2/28/19*
- *Comments submitted to DRBC on 3/21/19.*

Technical Comments

Monitoring

- EPA appreciates the effort put forth by DRBC to publish the 2018 water quality assessment.

Thank you – comment noted.

- EPA understands the monitoring challenges associated with the high river flows in 2018.

Thank you – comment noted.

- EPA encourages DRBC to consider incorporating non-tidal macroinvertebrate monitoring using PADEP's flowline semi-wadeable macroinvertebrate methodology in the next grant cycle. If PADEP's semi-wadeable methodology is useful for DRBC, it would provide comparable data to PADEP for PADEP to use to assess aquatic life use attainment of the PA portion of the non-tidal Delaware River.

DRBC is in the process of revising its nontidal biological monitoring program. As part of this process, the Academy of Natural Sciences reviewed DRBC's biomonitoring program and provided recommendations for potential changes. One recommendation was to revise the IBI methodology so that the data collected would be compatible with both the DRBC IBI and the PADEP SWMMI. DRBC is open to revising the IBI methodology but will first convene a working group to review the Academy's document and endorse any potential changes. DRBC plans to convene this group in the coming months and implement any changes for the 2020 biomonitoring season.

Nutrients

- EPA notes that the nutrient monitoring continues to be on track for timely completion. If that timeline shifts, please keep EPA informed.

Thank you – comment noted.

PCBs

- EPA recognize that due to staffing changes the PMP list was not available however in the future, please make sure that list is available for EPA review.

Thank you – comment noted.

Eutrophication Model

- As per the grant conditions outlined in your 106 award, please provide a QAPP for the Eutrophication Model ASAP. Programmatic grant condition below
 - Grantees implementing environmental projects that include: 1) direct measurement, sampling or observation activities, 2) environmental modeling, 3) use of existing data, 4) use of survey results, or 5) calculation of environmental outcomes must prepare and implement a Quality Assurance Project Plan (QAPP). The grantee shall submit to the EPA Project Officer (PO) an approvable QAPP within 45 days of receipt of this agreement. The PO will review the QAPP to insure that it meets programmatic needs, is consistent with the approved workplan and includes all of the required QAPP elements. Once approved by the EPA PO, the QAPP is forwarded to the EPA QA staff for review and approval. No data collection/use activities may occur until the QAPP has been reviewed and approved by EPA.

DRBC is working on the model QAPP. We expect a draft to be submitted to EPA by May 17th.

Grant Management

- EPA appreciates DRBC's timely submittal of their annual reporting

Thank you – comment noted.

- EPA anticipates some changes in the technical staff will occur in 2019 due to retirement and realignment and will continue to keep DRBC informed

Thank you – comment noted.